

ORIGINAL
FILE

LAW OFFICES
HALEY, BADER & POTTS

SUITE 600

2000 M STREET, N.W.

WASHINGTON, D.C. 20036-4574

(202) 331-0606

RECEIVED

JAN 23 1989

MELODIE A. VERTUE
JAMES E. DUNSTAN
MARY PRICE TAYLOR
KATHLEEN VICTORY (PA)
DAVID G. O'NEIL

LARRY D. SUMMERVILLE
BROADCAST ANALYST

TELECOPIER

(202) 296-8679

Federal Communications Commission
Office of the Secretary

January 23, 1989

87-268

ANDREW G. HALEY (1904-1986)

MICHAEL H. BADER
WILLIAM J. POTTS, JR.
HENRY A. SOLOMON
WILLIAM J. BYRNES
RICHARD M. RIEHL
JOHN WELLS KING
JOHN M. PELKEY
LEE W. SHUBERT
JOHN CRIGLER
PATRICE A. LYONS
THEODORE D. KRAMER

KENNETH A. COX
COUNSEL

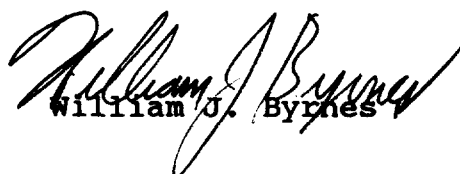
Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, DC 20554

Dear Ms. Searcy:

Transmitted herewith on behalf of MCI Telecommunications Corporation are an original and nine copies of its Reply Comments In the Matter of Advanced Television Systems and Their Impact on the Existing Television Broadcast Service; Review of Technical and Operational Requirements: Part 73-E; Reevaluation of the UHF Television Channel and Distance Separation Requirements, MM Docket No. 87-268.

If there are any questions concerning this matter, kindly communicate directly with this office.

Sincerely yours,


William J. Byrnes

WJBpg

Enclosures

0 + 9

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JAN 23 1988
ORIGINAL FILE
Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the Existing)
Television Broadcast Service)
)
Review of Technical and Operational)
Requirements: Part 73-E)
)
Reevaluation of the UHF Television)
Channel and Distance Separation)
Requirements)

MM Docket No. 87-268

REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation submits these Reply Comments pursuant to the Commission's Tentative Decision and Further Notice of Inquiry of September 1, 1988 in the proceeding captioned above, 65 RR 2d 295, 305. MCI urges that the Commission take appropriate steps to promote the adoption of a receiver interface standard permitting diverse inputs on a non-discriminatory basis.

A large number of very thoughtful and useful comments have been filed. They reflect a wide variety of technological and economic judgments. Many of these differences can and should be worked out by the normal processes of the marketplace. The Commission should adopt a framework that permits qualified organizations with differing visions to pursue them without imposing unnecessary a priori constraints on others with different approaches. The fundamental question for the Commission is

to determine which questions must be resolved by governmentally enforced standards and which can be left to the marketplace. MCI agrees that, while there may be a need to adopt a transmission standard for broadcast television, no transmission standard should be adopted with respect to alternative delivery technologies.

The comments make abundantly clear that the public is currently limited to a technologically archaic set of television standards. The principal impediment to the development of television service reflecting the technical state of the art is the massive investment by the public in television receivers requiring the use of technically outdated standards. This is not only the biggest problem, but the one which by its nature, requires the longest time to remove.

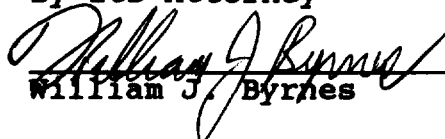
It is not in the public interest to bend all transmission and delivery technologies to the Procrustean bed of the limited bands available for television distribution in the radio spectrum. The Commission should encourage efforts to insure that receivers from now on are made as accommodating as possible not only to new and old broadcast transmission standards, but also readily and efficiently to VCR's, cable, optical fiber, DBS, optical disks, computers and other technologies. This will promote competition and ensure the best service for the public. MCI agrees with the many parties who have emphasized the

importance of assuring the development of an ATV receiver interface standard. Such an interface should assure the availability of receivers, not only to traditional television entertainment services through a variety of media, but also to other services using video displays from sources as diverse as possible. The interface chosen should neither exclude nor handicap any potential provider of services or equipment that makes use of video displays. The Commission should closely monitor industry discussions to assure that smaller parties are not adversely affected by the development of interface standards that give preferential advantage to dominant entities. The views of all potentially affected parties with an interest in the provision of services and equipment involving the use of video displays should be obtained in the development standards so that any possibility of unfair discrimination is avoided.

Respectfully submitted,

**MCI TELECOMMUNICATIONS
CORPORATION**

By its Attorney



William J. Byrnes

Of Counsel:

John M. Scorce
MCI Telecommunications Corp.
1133 19th Street, N.W.
Washington, D.C. 20036

January 23, 1989

Haley, Bader & Potts
2000 M Street, N.W.
Suite 600
Washington, D.C. 20036
(202) 331-0606

CERTIFICATE OF SERVICE

I, Pat Green, do hereby certify that copies of the foregoing REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION were served this 23rd day of January, 1989, by first class mail, postage prepaid, upon the following on the attached service list.

Pat Green

Pat Green

SERVICE LIST

Jonathan D. Blake
Gregory M. Schmidt
Martin Wald
Attorneys for
THE ASSOCIATION OF
MAXIMUM SERVICE
TELECASTERS INC.
Covington & Burling
1201 Pennsylvania Ave., N.W.
P. O. Box 7566
Washington, DC 20044

Henry L. Baumann
Valerie G. Schulte
Attorneys for
NATIONAL ASSOCIATION OF
BROADCASTERS
1771 N Street, N.W.
Washington, DC 20036

Robert A. Beizer
Attorney for
AMERICAN FAMILY BROADCAST
GROUP INC.
Schnader, Harrison, Segal
& Lewis
1111 19th Street, N.W.
Washington, DC 20036

James E. Meyers
B. Jay Baraff
Attorneys for
TELE-COMMUNICATIONS, INC.
Baraff, Koerner, Olender
and Hochberg, P.C.
2033 M Street, N.W.
Suite 700
Washington, DC 20036

Peter Gutmann
Attorney for
COSMOPOLITAN BROADCASTING
CORPORATION
Pepper & Corazzini
200 Montgomery Bldg.
1776 K Street, N.W.
Washington, DC 20006

Ken Lager
Chairman and CEO
A-VISION
75 Marathon Street
Arlington, MA 02174

Dr. William E. Glenn
Director
NEW YORK INSTITUTE OF
TECHNOLOGY SERVICE AND
TECHNOLOGY RESEARCH CENTER
8000 N. Ocean Drive
Dania, FL 33004

James R. Hobson
Attorney for
GTE SERVICE CORP.
1850 M Street, N.W.
Suite 1200
Washington, DC 20036

Gary J. Shapiro
Attorney for
CONSUMER ELECTRONICS
GROUP OF THE ELECTRONIC
INDUSTRIES ASSOCIATION
2000 Eye Street, N.W.
Washington, DC 20006

Dr. D. Joseph Donahue, VP
Senior Scientist
GE ELECTRIC CONSUMER
ELECTRONICS, INC.
600 N. Sherman Drive
P.O. Box 1976
Indianapolis, IN 46206

Floyd S. Keene
Michael S. Pabian
Attorneys for
AMERITECH OPERATING
COMPANIES
30 South Wacker Drive
Floor 38
Chicago, IL 60606

Andrew D. Lipman
Attorney for
SATELLITE BROADCASTING &
COMMUNICATIONS ASSOCIATION
OF AMERICA
Pepper, Hamilton & Scheetz
1777 F Street, N.W.
Washington, DC 20006

Charles M. Meehan, Chairman
LAND MOBILE COMMUNICATIONS
COUNCIL
1150 17th Street, N.W.
Suite 1000
Washington, DC 20036

Herb L. Massie
President
LAND MOBILE COMMUNICATIONS
COUNCIL
80 East Jackson Blvd.
Chicago, IL 60606

James P. Tuthill
Betsy S. Granger
Attorneys for
PACIFIC BELL and
NEVADA BELL
140 New Montgomery Street
Room 1525
San Francisco, CA 94105

Stanley J. Moore
1275 Pennsylvania Ave., N.W.
Washington, DC 20004

Peter Tannenwald
Attorney for
RADIO TELECOM AND
TECHNOLOGY, INC.
Arent, Fox, Kintner,
Plotkin & Kahn
1050 Connecticut Ave., N.W.
Washington, DC 20036-5339

E. William Henry
Robert Hopkins
Attorneys for
UNITED STATES ADVANCED
TELEVISION SYSTEMS COMMITTEE
1771 N Street, N.W.
Washington, DC 20036

Brian Conboy
Vice President
Government Affairs
TIME, INC.
Suite 850
1050 Connecticut Ave., N.W.
Washington, DC 20036

Lois J. Schiffer
Karen Christensen
Attorneys for
NATIONAL PUBLIC RADIO
2025 M Street, N.W.
Washington, DC 20036

Joseph DeFranco
Mark W. Johnson
Attorneys for
CBS, INC.
1800 M Street, N.W.
Washington, DC 20036

George Vradenburg III
Attorney for
CBS, INC.
51 W. 52nd Street
New York, NY 10019

David Sillman
Secretary
CENTER FOR ADVANCED
TELEVISION STUDIES
c/o Public Broadcasting
Service
1320 Braddock Place
Alexandria, VA 22314

Thomas M. Hafner
Attorney for
NORTH AMERICAN PHILIPS
CORPORATION
One Phillips Drive
P. O. Box 14810
Knoxville, TN 37914-1810

Edward J. Goldstein
Attorney for
NORTH AMERICAN PHILIPS
CORPORATION
100 East 42nd Street
New York, NY 10017

James. L. Casserly
Squire, Sanders & Dempsey
1201 Penn. Ave., N.W.
Washington, DC 20004

Gary M. Epstein
Aileen P. Amarandos
Attorneys for
HUGHES COMMUNICATIONS, INC.
Latham & Watkins
1333 New Hampshire Ave., NW
Suite 1200
Washington, DC 20036

John J. Pederson
Attorney for
ZENITH ELECTRONICS CORP.
1000 Milwaukee Ave.
Glenview, IL 60025

Quincy Rodgers
Associate General
GENERAL INSTRUMENT CORP.
Fourth Floor
1155 21st Street, N.W.
Washington, DC 20036

Jeffrey Krauss
Consultant
15200 Shady Grove Rd.
Suite 450
Rockville, MD 20850

Sam Antar, Vice Pres.
Law & Regulation
Attorney for
CAPITAL CITIES/ABC, INC.
1330 Avenue of the Americas
New York, NY 10019

Joel Rosenbloom
John Payton
Attorneys for
CAPITAL CITIES/ABC, INC.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037

William C. Sullivan
Melanie S. Fannin
Michael J. Zpevak
Diana J. Harter
Attorneys for
SOUTHWESTERN BELL
TELEPHONE COMPANY
1010 Pine Street
Room 2305
St. Louis, MO 63101

Andrew J. Schwartzman
Gigi B. Sohn
Attorneys for
MEDIA ACCESS PROJECT
AND THE TELECOMMUNICATIONS
RESEARCH AND ACTION PROJECT
2000 M Street, N.W.
Washington, DC 20036

Brenda L. Fox
Loretta P. Polk
Attorneys for
NATIONAL CABLE TELEVISION
ASSOCIATION, INC.
1724 Mass. Ave., N.W.
Washington, DC 20036

Tom Leonard, President
M/A-COM MAC DIVISION
5 Omni Way
Chelmsford, MA 01824

Jeffrey Krauss, Consultant
M/A-COM MAC DIVISION
15200 Shady Grove Rd.
Suite 450
Rockville, MD 20850

Dr. William F. Schreiber
Director
ADVANCED TELEVISION
RESEARCH PROGRAM (THE
MEDIA LABORATORY OF THE
MASSACHUSETTS INSTITUTE
OF TECHNOLOGY)
E15-387 MIT
Cambridge, MA 02139

Tom W. Davidson
Margaret L. Tobey
Attorneys for
SONY CORPORATION
Sidley & Austin
1722 Eye Street, N.W.
Washington, DC 20006

Thomas L. Welch
Leslie A. Vial
Attorneys for
THE BELL ATLANTIC
TELEPHONE COMPANIES
1710 H Street, N.W.
Washington, DC 20006

Howard Monderer
Vice President - Law
Molly Pauker
Attorneys for
NATIONAL BROADCASTING
COMPANY, INC.
1825 K Street, N.W.
Suite 807
Washington, DC 20006

Paula A. Jameson
Barbara S. Wellbery
Louise Lynch
Attorneys for
THE PUBLIC BROADCASTING
SERVICE
1320 Braddock Place
Alexandria, VA 22314

Paul E. Symczak
Attorney for
CORPORATION FOR PUBLIC
BROADCASTING
1111 16th Street, N.W.
Washington, DC 20036

Baryn S. Futa
Martha Malkin Zornow
Attorneys for
THE NATIONAL ASSOCIATION
OF PUBLIC TELEVISION
STATIONS
Suite 410
1818 N Street, N.W.
Washington, DC 20036

J. Laurent Scharff
James M. Smith
Attorneys for
ASSOCIATION OF
INDEPENDENT TELEVISION
STATIONS, INC.
Pierson, Ball & Dowd
1200 18th Street, N.W.
Washington, DC 20036

The Staff of the Bureau of
Economics
FEDERAL TRADE COMMISSION
Pennsylvania Ave. at
6th Street, N.W.
Washington, DC 20580

Dr. Masao Sugimoto
Director
NHK SCIENCE AND TECHNICAL
RESEARCH LABORATORIES -
THE JAPAN BROADCASTING
CORPORATION
1-10-11, Kinuta
Setagaya-ku, Tokyo
157 Japan

William B. Barfield
G. Thomas Abernathy, Jr.
Attorneys for
BELLSOUTH CORP., SOUTH
CENTRAL BELL TELEPHONE
CO. AND SOUTHERN BELL
TELEPHONE AND TELEGRAPH
COMPANY
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, GA 30367-6000

Dr. James E. Carnes
Vice President
Consumer Electronics and
Information Sciences
DAVID SARNOFF RESEARCH
CENTER INC.
CN 5300
Washington Road
Princeton, NJ 08543-5300

Booker T. Wade, Jr., Pres.
BLACK TELEVISION WORKSHOP
OF LOS ANGELES, INC.
4241 Redwood Avenue
Los Angeles, CA 90066

Benito Gaguine
Attorney for
BLONDER TONGUE LABORATORIES
Fley, Shuebruk, Gaguine,
Bows and Braun
1211 Connecticut Ave., N.W.
Washington, DC 20036-2768

Kenneth E. Satten
Attorney for
BONNEVILLE INTERNATIONAL
CORPORATION
Wilkinson, Barker, Knauer
& Quinn
1735 New York Ave., N.W.
Washington, DC 20006

2-8-12
Nishi-Shimbashi
Minato-Ku
BROADCASTING TECHNOLOGY
ASSOCIATION, JAPAN
Tokyo, Japan

James P. Riley
Attorney for
CHRONICLE BROADCASTING CO.
Fletcher, Heald & Hildreth
Suite 400
1225 Connecticut Ave., N.W.
Washington, DC 20036

Richard J. Iredale
THE DEL REY GROUP
Box 9254
Marina Del Rey, CA 90292

John A. Rafter
Werner S. Hartenberger
John S. Logan
Attorneys for
COSMOS BROADCASTING CORP.
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, DC 20037

Britt Conner
President and CEO
DIGIDECK
Suite 210
1503 Grant Road
Mountain View, CA 94040

David P. Robinson, VP
Engineering
DOLBY LABORATORIES
100 Potrero Street
San Francisco, CA 94103

Jeffrey Krauss
DOLBY LABORATORIES
Suite 450
15200 Shady Grove Road
Rockville, MD 20850

Yves Faroudja
President
FAROUDJA LABORATORIES, INC.
946 Benicia Ave.
Sunnyvale, CA 94086

Richard R. Zaragoza
Jonathan W. Emord
Attorneys for
FISHER BROADCASTING INC.
Suite 800
1225 23rd Street, N.W.
Washington, DC 20037

Vincent A. Pepper
Attorney for
GEEORGE N. GILLET, JR.
Pepper & Corazzini
1776 K Street, N.W.
Washington, DC 20006

Linda Townsend
Richard M. Firestone
David H. Krech
NATIONAL TELECOMMUNICATIONS
AND INFORMATION AGENCY
U.S. Department of Commerce
Room H4717
14th St. & Constitution
Ave., N.W.
Washington, D.C. 20230

John A. Rafter
Werner S. Hartenberger
John S. Logan
Attorneys for
COX ENTERPRISES, INC.
1255 23rd Street, N.W.
Washington, DC 20037

Bernard Koteen
Arthur B. Goodkind
Attorneys for
GREAT AMERICAN BROADCASTING
CO., MCGRAW HILL
BROADCASTING CO., INC. and
NEW YORK TIMES COMPANY
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Washington, DC 20036

Hitachi
Central Research Laboratory
HITACHI, LTD.
P.O. Box 2
Kokobunji 1, Tokyo 185
JAPAN

Mirian Kircher
Stephen Sharp
Attorneys for
JAPAN BROADCASTING CO.
1440 New York Ave., N.W.
Washington, DC 20005

Takeshi Sakomoto
JAPAN SATELLITE BROADCASTING
INC.
1-19-10 Toranomon
Minato-Ku
Tokyo 105 Japan

Marvin Rosenberg
Edward W. Hummers, Jr.
Attorneys for
KING BROADCASTING CO.
Suite 400
1225 Connecticut Ave., N.W.
Washington, DC 20036

Mickey L. Hooten, VP
& Gen. Mgr. of Television
THE HEARST CORPORATION
959 Eighth Avenue
New York, NY 10019

Ben C. Fisher
Attorney for
HUGHES COMMUNICATIONS
GALAXY, INC.
Fisher, Wayland, Cooper
& Leader
Suite 800
1255 23rd Street, N.W.
Washington, DC 20037-1125

Akiya Imura
President and CEO
MATSUSHITA ELECTRIC CORP.
OF AMERICA
One Panasonic Way
Secaucus, NJ 07094

John I. Davis
David J. Wittenstein
Elizabeth J. Gustafson
Attorneys for
METROVISION, INC.,
NEW CHANNELS CORP. and
SAMMONS COMMUNICATIONS,
INC.
Dow, Lohnes & Albertson
Fifth Floor
1255 23rd Street, N.W.
Washington, DC 20037

Allen R. Cooper, VP
Technology Evaluation and
Planning
MOTION PICTURE ASSOCIATION
OF AMERICA, INC.
1600 Eye Street, N.W.
Washington, DC 20006

David Honig
NATIONAL BLACK MEDIA
COALITION & NAACP
6032 Ocean Pines
Berlin, MD 21811

Peter Tannenwald
Attorney for
NATIONAL CAPTIONING
INSTITUTE, INC.
Arent, Fox, Kintner,
Plotkin & Kahn
1050 Connecticut Ave., N.W.
Washington, DC 20036-5339

Honorable Alfred C. Sikes
NATIONAL TELECOMMUNICATIONS
AND INFORMATION ASSOCIATION
Room 4898
14th & Constitution Ave.,
N.W.
Washington, DC 20230

Professor W. Russel Neuman
Director
Research Program on
Communications Policy
E53-367
Massachusetts Institute
of Technology
Cambridge, MA 02139

Sumihisa Sakuma
Exec. Managing Director
NIPPON TELEVISION
NETWORK CORP.
14 Niban-cho
Chiyoda-ku
Tokyo, Japan

Gerald Scher
Attorney for
OUTLET COMMUNICATIONS, INC.
Sundlun, Scher & Singer
Suite 460
1331 Pennsylvania Ave., N.W.
Washington, DC 20004

L. Stanley Paige
Vice Pres. for Legal Affairs
POST-NEWSWEEK STATIONS, INC.
1150 15th Street, N.W.
Washington, DC 20071

Lawrence J. Tighe, Jr.
Attorney for
RADIO NEW JERSEY
P.O. Box 1000
Hackettstown, NJ 07840

N. F. Hamilton-Piercy
Vice President
Engineering & Technical
Services
c/o ROGERS CABLESYSTEMS
ENGINEERING
Suite 2602
Commercial Union Tower
P.O. Box 249, T.D. Centre
Toronto, Ontario MSK1J5

James O. Farmer
Division Technical Manager
SCIENTIFIC ATLANTA
Broadband Communications
P.O. Box 105027
Atlanta, GA 30348

Donald P. Zeifang
Kenneth C. Howard, Jr.
Attorneys for
SCRIPPS-HOWARD
BROADCASTING CO.
Baker & Hostetler
1050 Connecticut Ave., NW
Washington, DC 20036

David R. Anderson
Timothy N. Black
Attorneys for
TIMES MORROR BROADCASTING
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037

S. Yasuda
TOSHIBA AMERICA, INC.
2900 MacArthur Blvd.
Northbrook, IL 60062-2089

Robert A. Beizer
Attorney for
TRIBUNE BROADCASTING
COMPANY
Schnader, Harrison, Segal
& Lewis
1111 19th Street, N.W.
Washington, DC 20036

Matthew D. Miller
Vice President, Science
& Technology
VIACOM INTERNATIONAL, INC.
121 Avenue of the Americas
New York, NY 10036

Hollis G. Duensing
General Solicitor
ASSOCIATION OF AMERICAN
RAILROADS
50 F Street, N.W.
5th Floor
Washington, DC 20001

Frederick W. Finn
Attorney for
VISIONAIRE, INC.
Brown, Finn & Nietert
Chartered
1920 N Street, N.W.
Suite 510
Washington, DC 20036

Reed E. Hundt
Robin L. Shaffert
Attorneys for
THE WIRELESS CABLE
ASSOCIATION INC.
1001 Pennsylvania Ave., N.W.
Suite 1300
Washington, DC 20004

Kathryn Riley Dole
Attorney for
TELEVISA, S.A.
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, DC 20006

Victor E. Ferrall, Jr.
Robert M. Halperin
Attorneys for
THE STATION
REPRESENTATIVES
ASSOCIATION, INC.
1001 Penn. Ave., N.W.
Washington, DC 20004-2505